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May 1, 2006

MAY - 1 2006

Federal Communications Commission  
Office of Secretary

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: CC Docket 94-102  
E911 Handset Penetration Quarterly Report  
California RSA No. 3 Limited Partnership d/b/a Golden State Cellular

Dear Ms. Dortch:

On behalf of California RSA No. 3 Limited Partnership d/b/a Golden State Cellular ("Golden State"), there is submitted herewith a report of the status of the carrier's progress in achieving 95% systemwide handset of location-capable handsets.

Golden State is a Tier III digital wireless carrier operating cellular radiotelephone services in California RSA 3. This report is submitted in compliance with the terms of the *Order*, CC Docket No. 94-102, FCC 05-201, released December 15, 2005, conditionally granting Golden State an extension through December 15, 2006, of the deadline for compliance with Section 20.18(g)(1)(v) of FCC rules, 47 C.F.R. § 20.18(g)(1)(v).

Pursuant to Sections 0.457(d) and 0.459 of FCC Rules, it is hereby requested that the information reported herein be treated by the Commission as confidential, and be withheld from public inspection. The information, which would not customarily be released to the public, is confidential commercial information, and should be protected in accordance with Sections 0.457(d) and 0.459 of FCC Rules.

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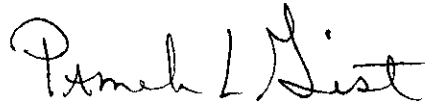
May 1, 2006

*Federal Communications Commission*

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Should any questions arise with respect to this matter, please feel free to communicate directly with the undersigned.

Very truly yours,

A handwritten signature in cursive script that reads "Pamela L. Gist". The signature is written in dark ink and is positioned above the printed name.

Pamela L. Gist

**CALIFORNIA RSA NO. 3 LIMITED PARTNERSHIP  
D/B/A  
GOLDEN STATE CELLULAR**

**E911 REPORT**

**MAY 1, 2006**

The following information is submitted in accordance with FCC directive:

**1. The number and status of Phase II requests from Public Safety Answering Points**

A total of five PSAPs are located within Golden State Cellular's service area. They are: Alpine, Mariposa, Tuolumne, Amador and Calaveras Counties. The California Highway Patrol coordinates all PSAP requests for Phase II services because all E911 calls are routed to either the California Highway Patrol or to the Yosemite National Patrol. Golden State Cellular has received from the California Highway Patrol a request to provide Phase II services to all five PSAP areas.

Golden State Cellular utilizes the services of TCS to install and test all equipment necessary to transmit E911 data to the California Highway Patrol. TCS has determined that the California Highway Patrol has become capable of receiving and utilizing Phase II data. TCS will operate the location database and optimize E911 performance on Golden State Cellular's CDMA network system. To prepare for provision of Phase II services, Golden State Cellular has placed an order with SBC Communications, Inc. (now AT&T) to obtain trunk lines, and expects them to be installed in early June. TCS is confirming the routing required by the

California Highway Patrol, and will be able to begin testing as soon as the trunk lines are operational.

**2. The estimated dates on which Phase II service will be available to PSAPs served by Golden State Cellular's wireless network**

Golden State Cellular expects to begin providing Phase II services to all five PSAPs in July 2006, which will be within six months of receipt of the request from the California Highway Patrol.

**3. The status of coordination efforts with PSAPs for alternative 95% handset penetration dates**

Golden State Cellular is actively working with PSAP officials with regard to the carrier's progress in achieving a higher location-capable handset penetration rate. Jan Opie, Product Development Manager for Golden State Cellular stays in regular contact with William Harry, Wireless E911/GIS Project Coordinator for the E911 Emergency Communications Office, Department of General Services of the State of California. Mr. Harry is the single point of contact for carriers concerning wireless E911 matters. Ms. Opie specifically keeps Mr. Harry updated on Golden State Cellular's penetration rate and Phase II deployment matters.

**4. Efforts to encourage customers to upgrade to location-capable handsets**

Golden State Cellular notifies customers as to which PSAP areas located within Golden State Cellular's service area will be capable of receiving and processing the Phase II E911 data received from Golden State Cellular, and when the other

PSAPs are expected to become capable. By means of billing inserts, print advertising and website postings, customers are informed that by upgrading their handsets they will have the ability to automatically transmit their location information to emergency officials when they call 911.

At the same time, promotional campaigns to encourage handset upgrades have been conducted in print ads and billing inserts, and by phone calls to customers. Special offers are promoted on Golden State Cellular's web site and by signage on premises. The ads emphasize the benefit of early renewal for analog customers who trade in their old handsets. The campaigns offer free phone upgrades and discounts, and promotions for phones with cameras, ringtones, color screens and other features help entice customers to upgrade their handsets. The newer campaigns will advertise the safety and coverage advantages of the CDMA system, and will emphasize as a feature of the new phones their location assistance capabilities in the event of emergency.

#### **5. The extent of subscribers located in areas with analog service only**


As of April 30, 2006, about 1,282 of Golden State Cellular's customers, representing 8% of subscribers, resided in areas served by analog signal only. About 5% of all minutes of use occurred on the analog signal, and 6.3% of calls were placed on the analog system. A map of Golden State Cellular's CDMA coverage area is attached. The areas not covered are served by analog signal only.

***6. The percentage of customers with location-capable phones***

At this time, 80% of Golden State Cellular's subscribers are using Phase II location-capable handsets. The percentage rate has risen eight percentage points over the last three months.

**7. Status in achieving compliance and whether Golden State Cellular is on schedule to meet its revised deadline of 12/15/06**

Golden State Cellular maintains its policy of selling and activating only location-capable digital handsets. It continues to expand its CDMA network facilities and to conduct marketing campaigns to encourage consumer adoption of new handsets. Golden State Cellular expects to reach the 95% benchmark by December 15, 2006.



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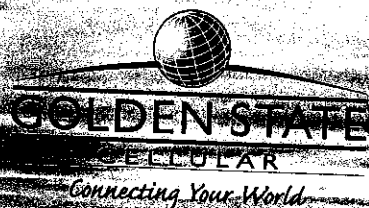


We hope calling 911 is never needed, but if it is, we want you to have the best possible help. To meet that goal, Golden State Cellular is working with the California Highway Patrol to enable rescue personnel to find you even if you cannot convey your location. Golden State Cellular and the California Highway Patrol are upgrading systems to enable this new enhanced 911 service. The system should be completed in late summer early fall 2006.

Only E911 phones utilizing Golden State Cellular's network will be capable of location based 911 services. These include all phones purchased from Golden State Cellular since November 1, 2004. **Older digital and analog phones do not have enhanced 911 location capabilities.** If you aren't sure either stop by one of our stores or call our Customer Service at 800-453-8255. If you upgrade your handset, your location information will be automatically transmitted when you dial 911.

Please take advantage of Golden State Cellular's special offers on upgraded handsets.

You and your family will be glad you did.



For more information or to upgrade to a E911 compatible phone  
call Golden State Cellular Customer Service

**1-800-453-8255**





**safety**

**Important  
Subscriber Safety  
Information**





